

Rhoades, Diana
Page 1 of 1

Diana Rhoades • 425 W. Paseo Redondo Suite 5A • Tucson, AZ 85701 • 520.623.0908

September 23, 2003

Sue Kozacek
Acting Forest Supervisor
Coronado National Forest
300 W. Congress
Tucson, AZ 85701

RE: Opposition to Tucson Electric Power (TEP) Company Sahuarita-Nogales Transmission
Line Draft Environmental Impact Statement (DEIS)

Dear Ms. Kozacek:

1 I am writing to urge you to withdraw the current draft Environmental Impact
Statement for Tucson Electric Power's proposed 345 kV powerline. Southern Arizonans do
not need a powerline that threatens the habitat of Jaguar. Yes, jaguar live in this area. We
have to do all we can to preserve this important habitat.

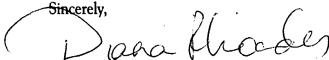
I oppose TEP's proposed "Western Route" and "Crossover Route" and believe this is an
unnecessary project.

2 The important goal of providing fully reliable electrical service to the city of Nogales and
Santa Cruz County must be achieved. Unfortunately, instead of building the small
transmission line necessary to serve Nogales, TEP has proposed a massive, environmentally
destructive, and extremely controversial powerline which would primarily serve Mexico.

3 The draft EIS is clearly inadequate, because it does not address important alternatives to
TEP's powerline which would provide reliable service without destroying our
environmental and cultural heritage, and which would not require massive increases to
consumers' electricity bills.

I urge DOE to issue a new draft EIS which fully explores all options (including a local
power plant and smaller power lines which would not serve Mexico) which would meet the
important public interest of providing reliable energy service to Santa Cruz County.

Sincerely,



Diana Rhoades
Concerned Southern Arizona Resident

Comment No. 1.

Sections 3.3 and 4.3 present a description of the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to jaguar.

Comment No. 2

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system...." When a Federal agency is evaluating a request for a permit for a proposed action developed by a non-Federal applicant (e.g., TEP), CEQ has opined that Federal agencies should select alternatives which are feasible given the applicant's stated goals and reflect the "common sense realities" of the situation. Therefore, the Federal agencies are evaluating the proposed project presented by TEP to each of the Federal agencies (see Section 1.2.2, Federal Agencies' Purpose and Need Statements).

Comment No. 3

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable

Comment No. 3 (continued)

range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

Rhodes, Jonathan
Page 1 of 2

From: noisedr@yahoo.com
Sent: Sunday, October 12, 2003 6:52 PM
To: Pell, Jerry
Subject: Environmental Impact Statement for Tucson
Electric Power's proposed 345 kilovolt powerline

Dr. Jerry Pell
U.S. Department of Energy, Office of Fossil Energy (FE-
27) 1000 Independence Avenue, SW Washington, DC
20585

Dear Dr. Pell,

1 You should withdraw the current draft Environmental
Impact Statement for Tucson Electric Power's proposed 345
kilovolt powerline.

2 TEP's proposed routes go through critically important wild
areas. You should withdraw the EIS and completely scrap
building a powerline through wild country that provides
habitat for a number of important desert species.

3 The draft EIS is clearly inadequate, because it does not
address important alternatives to TEP's powerline which
would provide reliable service without destroying our
environmental and cultural heritage, and which would not
require huge increases to consumers' electricity bills.

4 The recent blackout in the Northeast is an urgent reminder
that our energy policy should be based on serving the public
interest, not corporate private profits. I urge DOE to issue a
new draft EIS which fully and rigorously explores all

Comment No. 1

The Federal agencies note the commentor's suggestion that DOE should withdraw the current Draft EIS.

Comment No. 2

Sections 3.3 and 4.3 discuss the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to the endangered, threatened and special status species.

Comment No. 3

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

Rhodes, Jonathan
Page 2 of 2

4
cont. | available options-including a local power plant and smaller
power lines which would not serve Mexico-to meet the
important public interest of providing reliable energy
service to Santa Cruz County.

You sinecures should also get real jobs.

Sincerely,

Jonathan Rhodes
P.O. box 15286
Portland, Oregon 97293

Comment No. 4

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

Rogers, John
Page 1 of 2

**COMMENTS BY JOHN L ROGERS,
REGISTERED PROFESSIONAL ENGINEER
WITH FOUR YEARS OF POWER COMPANY
EXPERIENCE IN TRANSMISSION AND
DISTRIBUTION SYSTEMS.**

**LIST OF PREPARERS AND CONTRIBUTORS,
CHAPTER 13 –**

- 1 **Only one registered professional engineer as a civil engineer. Professional electrical engineers have not certified with a stamp.**

APPENDIX B

- 2 **Appendix B covers Electric and Magnetic Fields Background information. However, the EMF interaction between the proposed 345KV-transmission line and the natural gas line in the central corridor is not discussed. The potential of an induced current in the natural gas line should be addressed in detail. The induced current could cause early failure of the natural gas line, which could lead, to catastrophic damage to people and property.**

**ELECTRIC AND MAGNETIC FIELDS,
CENTRAL CORRIDOR 4.10.1.2 The effects on the natural gas pipeline, which would parallel the power line, is not addressed.**

Comment No. 1

An EIS is not a detailed engineering design document meant to certify a project's design, but rather an EIS is a document that identifies and discloses potential environmental impacts. No professional engineer stamp is required.

Comment No. 2

Section 4.10 of the Final EIS has been revised to include discussion on safety considerations for collocating natural gas pipelines and transmission lines. A minimum distance of 100 ft (30 m) would be maintained between any of the proposed transmission line structures and the edge of the existing EPNG pipeline ROW, in compliance with the Amended Certificate of Environmental Compatibility issued to TEP on October 29, 2001, ACC (see Section 4.10 of the Final EIS). As shown in Table 10-2 of the EIS, the Federal agencies consulted with EPNG regarding safety requirements, and EPNG concurred that the ACC's requirement is adequate.

Rogers, John

Page 2 of 2

2
cont.

The parallel pipe line and transmission line creates a dangerous potential for an accident. One question in particular is how will the induced current on the gas pipeline affect the potential for early pipeline failure. The EIS keeps stating that the natural gas pipeline will be within a distance of one-half mile, which could mean that the transmission line and pipeline could be within a distance of only 50 feet for many miles. This needs to be specifically addressed at to how far the transmission line will be kept from the existing natural gas pipeline plus the total miles the two will be paralleled. Corrosion of the gas line could cause a leak, which could be ignited by a random spark. This needs to be addressed.

Rogers, John
Page 1 of 1

Fwd: Comments of EIS Draft DOE/EIS-0336

From: JROGERSINC@aol.com
[SMTP:JROGERSINC@aol.com]
To: Pell, Jerry
Cc: LMagruder@aol.com

Subject: Fwd: Comments of EIS Draft DOE/EIS-0336
Sent: 10/14/2003 4:21 PM
Importance: Normal

An additional thought regarding the safety of co-locating the transmission and gas lines.

A "qualified" registered professional engineer should put his or her reputation on the line by stamping/certifying that the co-location of the power and gas lines as proposed by TEP are completely safe and there have been no problems in the past with closely paralleling these types of utilities.

Of course it would be better if TEP would also certify the same and assume full responsibility for any human or property damage that might occur in the future. However, I doubt that TEP would have the guts to do this since they are run by lawyers who would not want to be held responsible.

John Rogers, PE
PO Box 4567
Tubac, AZ 85646

520-398-2109

Comments of EIS Draft DOE/EIS-0336

Comment No. 1

An EIS is not a detailed engineering design document meant to certify a project's design, but rather an EIS is a document that identifies and discloses potential environmental impacts. No professional engineer stamp is required.

Assessment of liability is outside the scope of the EIS.

Section 4.10 of the Final EIS has been revised to include discussion on safety considerations for co-locating gas and transmission line.

Rosen, Philip C.
Page 1 of 1

Tucson Electric Power Sahuarita-Nogales Transmission line
DEIS

From: Philip C. Rosen [SMTP:pcrosen@u.arizona.edu]
To: Pell, Jerry
Cc:

Subject: Tucson Electric Power Sahuarita-Nogales
Transmission line DEIS
Sent: 9/22/2003 10:33 PM
Importance: Normal

Dear Sir,

1 The powerline proposal connecting Arizona and Sonora
through the wilderness in southeastern Arizona may seem
like a good money-making idea, but its cost in values you
might not ordinarily tabulate far outweighs your benefit. I
am strongly opposed to your plan, and request you put the
lines underground or along some pre-existing eyesore, or
abandon the plan altogether.

Philip C. Rosen,
Assistant Research Scientist Renewable Natural Resources
University of Arizona
Tucson, AZ 85721
520-621-3187
Ph 520-670-5001 fax
pcrosen@u.arizona.edu

Comment No. 1

Because of the disadvantages and cost differential associated with burying transmission lines, this alternative is not evaluated in detail in the EIS. Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis, has been revised to indicate that the option of burying transmission lines was considered but eliminated from further analysis in the EIS.

A portion of each of the action alternatives follows or crosses an existing natural gas pipeline (see Table 2.3-1, Summary Comparison of Potential Environmental Effects of Alternatives) that is within a utility corridor and has some access roads and other associated ground disturbance. Building a line adjacent to the existing transmission line in the I-19 corridor was considered but eliminated from further analysis in the EIS (see Section 2.1.5 of the Final EIS).

Rudy, Michelle
Page 1 of 2

----- Forwarded by Susan K Kozacek/R3/USDAFS on
10/09/2003 06:51 PM -----
mrudy@u.arizona.edu
10/09/2003 05:54 PM

To: skozacek@fs.fed.us
cc:
Subject: Environmental Impact Statement for Tucson
Electric Power's proposed 345 kilovolt powerline

Ms. Sue Kozacek
Coronado National Forest
Federal Building, 300 West Congress
Tucson, AZ 85701

Dear Ms. Kozacek,

I realize that this is a form letter, but it fully and
completely expresses my views on the subject. I
1 | wholeheartedly support a local power plant in Santa Cruz
County. These transmission lines do not serve the needs of
the public.

Thank you, Michelle...

2 | I am writing to urge you to withdraw the current draft
Environmental Impact Statement for Tucson Electric
Power's proposed 345 kilovolt powerline.

3 | TEP's proposed "Western Route" and alternative "Crossover
Route" would carve through some of the most remote and
wild areas in Southeast Arizona, forever scarring the
beautiful and irreplaceable landscape of the Tumacacori

Comment No. 1

Refer to the responses to Comments 4 and 6 below.

Comment No. 2

The commentor's opinion that the Draft EIS should be withdrawn is noted.

Comment No. 3

Sections 3.1 and 4.1 describe existing land use resources and analyze potential impacts to these resources, including potential impacts to the Tumacacori Mountains and the Tumacacori EMA of the Coronado National Forest.

Sections 3.1, Land Use, and 3.12, Transportation, discuss the IRAs within the Coronado National Forest. Sections 4.1, Land Use, and 4.12, Transportation, evaluate potential impacts to IRAs.

Section 5.2.4 acknowledges the citizen-initiated proposal for an addition to the National Wilderness Preservation System.

Sections 3.3 and 4.3 discuss the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to wildlife.

Rudy, Michelle
Page 2 of 2

3
cont.

Highlands. This area contains several roadless areas as well as a citizen's proposed Wilderness area home to black bears, Mexican spotted owls, lesser-long nosed bats and peregrine falcons as well as lesser known species such as the Sonora chub, Mexican vine snake, elegant trogon and the Gentry indigo bush. A jaguar was sighted in this area only two years ago.

4

The important goal of providing fully reliable electrical service to the city of Nogales and Santa Cruz County must be achieved. Unfortunately, instead of building the small transmission line necessary to achieve this goal, TEP has proposed a massive, environmentally destructive, and extremely controversial powerline designed to export power to Mexico.

5

The draft EIS is clearly inadequate, because it does not address important alternatives to TEP's powerline which would provide reliable service without destroying our environmental and cultural heritage, and which would not require huge increases to consumers' electricity bills.

6

The recent blackout in the Northeast is an urgent reminder that our energy policy should be based on serving the public interest, not corporate private profits. I urge DOE to issue a new draft EIS which fully and rigorously explores all available options-including a local power plant and smaller power lines which would not serve Mexico-to meet the important public interest of providing reliable energy service to Santa Cruz County.

Sincerely,

MICHELLE RUDY
725 E. 10TH STREET #16
TUCSON, Arizona 85719

Comment No. 4

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system...." When a Federal agency is evaluating a request for a permit for a proposed action developed by a non-Federal applicant (e.g., TEP), CEQ has opined that Federal agencies should select alternatives which are feasible given the applicant's stated goals and reflect the "common sense realities" of the situation. Therefore, the Federal agencies are evaluating the proposed project presented by TEP to each of the Federal agencies (see Section 1.2.2, Federal Agencies' Purpose and Need Statements).

Comment No. 5

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

Comment No. 6

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis.)

Rueb, John
Page 1 of 2

Comment Nos. 1-5

Refer to the responses to John Rueb in the public hearing transcript from Green Valley, Arizona, September 25, 2003, 7 p.m. to 9 p.m., for each respective comment.

John Rueb
HC 65 Box 6259
Amado, Az. 85645

9/24/03

1 I'm John Rueb, a resident of the Arivaca area near the proposed western route.
Thanks for the opportunity to make a few comments concerning your draft EIS.
I'm entirely against the construction of the 345kV lines in any location. I believe
they are totally unnecessary and complete overkill for the needs of Nogales and
Santa Cruz county. A 115kV line would be more than sufficient , and a local
2 power plant would be even more appropriate for providing excess capacity for
future energy needs. Curiously, there is no comparative effects analysis of this
alternative in your draft.

3 So, why are Santa Cruz County residents, one of the poorer counties in the state,
forced to pay for an intrusive monstrosity which will be of little incremental
benefit to them? They are being adversely impacted financially as well as
environmentally by this powerline.

4 So, let's get to the real reason for the lines which of course is to trade power with
Mexico- part of a North American Energy Alliance- a NAFTA of sorts for energy
which has sprung from energy deregulation. This deregulation has played a
significant role in energy disasters on both coasts. Apparently we need less horse
trading and more public regulation of energy markets. We're learning the hard
way that we can't rely on the Kenneth Lays of the world to deliver power where
it's needed. One of the California energy swindle perpetrators has gone "belly up",
but others are lining up to sell power to the state from new plants constructed just
south of the border. As many as 20 such plants are in the works. Why? Low
construction costs, cheap labor, quick licensing, and lax environmental
regulations. So, even though Arizona currently has excess generating capacity, the
intentions are obvious and the energy will flow through these lines from the
cheapest source. It's not about backup power for Nogales- that's just the cover
story - a weapons of mass destruction type diversion .

Unfortunately, our environment has little concern for lines on a map. our
prevailing winds come from Mexico, what's left of the Santa Cruz river flows
from Mexico, and we share the same Sonoran Desert Ecosystem. Your document
does not address the (and I quote National Environmental Policy Act guidelines)

Rueb, John

Page 2 of 2

“cumulative effects of reasonably foreseeable future actions regardless of what agency or persons undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time.” “ These effects include indirect effects, which are caused by the action and are later in time or farther removed in distance , but are still reasonably foreseeable.”

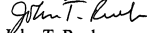
4
cont.

In other words, this is the last opportunity we will have to mitigate the environmental effects of a foreseeable consequence of this line- poorly regulated powerplants at the other end operating in our ecosystem. After this powerline is built , it's out of our hands and into the arms of the multinational energy corporations which will seek only to maximize shareholder value. Further environmental degradation is inevitable- beyond that of the lines themselves.

2
cont.

In summary, I urge DOE to include these “reasonably foreseeable future actions” and “indirect effects” in your final draft and decision. NEPA guidelines lead you to a cumulative effects analysis which considers “expanded geographic and time boundaries.” Also, include a comparative effects analysis of a local Nogales powerplant alternative. And 3, settle on the no action alternative since a return to an analysis of Nogales’ alleged energy shortfalls will show that subsequent upgrades and existing backup power may be sufficient.

5

Thank you,

John T. Rueb